

EXHIBIT 15

FILED UNDER SEAL

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

WAYMO LLC,

Plaintiff,

vs.

No. 3:17-cv-00939-WHA

UBER TECHNOLOGIES, INC.;

OTTOMOTTO LLC; OTTO TRUCKING,

INC.,

Defendants.

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WAYMO & UBER CONFIDENTIAL ATTORNEYS' EYES ONLY

VIDEOTAPED DEPOSITION OF GREGORY KINTZ

SAN FRANCISCO, CALIFORNIA

WEDNESDAY, APRIL 26, 2017

BY: ANDREA M. IGNACIO, CSR, RPR, CRR, CCRR, CLR ~

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JOB NO. 2592507

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1 [REDACTED] [REDACTED]
[REDACTED] [REDACTED] 15:11
3 Do you see that? 15:11
4 A I do see that. 15:11
5 Q So would you agree that Schultz discloses 15:11
6 that [REDACTED] [REDACTED]
[REDACTED] [REDACTED]? 15:11
8 MR. JAFFE: Objection; form. 15:11
9 THE WITNESS: The device in question here in 15:11
10 this Ph.D. thesis from a student in Germany refers to 15:11
11 a high-powered laser diode bar with multiple emitters 15:11
12 where the bar is bonded to a heat sink. There is 15:11
13 another contact bar on top of the device. 15:11
14 And this has little or no relationship to a 15:11
15 [REDACTED] 15:12
16 MR. KIM: So that wasn't responsive to my 15:12
17 question. Let me ask you a different one. 15:12
18 Q On page 63 -- can you turn to page 63. 15:12
19 A (Witness complies.) 15:12
20 Q Do you see Figure 4-10? 15:12
21 A I do. 15:12
22 Q Where it's labeled: 15:12
23 [REDACTED] [REDACTED]
[REDACTED] [REDACTED] 15:12
25 Do you see that? 15:12

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1 A Yes. 15:12

2 Q And above that label, [REDACTED] [REDACTED]

3 [REDACTED] [REDACTED]

4 [REDACTED] 15:13

5 Do you see that? 15:13

6 A Yes. 15:13

7 Q Okay. This depicts [REDACTED] [REDACTED]

8 [REDACTED] correct? 15:13

9 A Again, [REDACTED] [REDACTED]

10 [REDACTED] [REDACTED]

11 [REDACTED] 15:13

12 [REDACTED] [REDACTED]

13 [REDACTED] 15:13

14 [REDACTED]

15 Q That's not my question. 15:13

16 My question is: That figure depicts [REDACTED] [REDACTED]

17 [REDACTED] [REDACTED]

18 [REDACTED]; correct? 15:13

19 MR. JAFFE: Objection; form. 15:13

20 THE WITNESS: As you see in this figure, 15:13

21 there is [REDACTED] 15:13

22 But the greater body of knowledge of the 15:13

23 packaging of even the specific type of high-powered 15:13

24 laser diode bars as referenced in the Liu textbook 15:14

25 indicates that the ideal configuration for these 15:14

1 So I don't think there is a clear answer to 16:13
2 your question. 16:13
3 MR. KIM: Q. It wouldn't be a simple 16:13
4 modification to just go from these two separate 16:13
5 cavities and to put all 64 boards and diodes into a 16:13
6 single cavity? 16:13
7 MR. JAFFE: Objection; form. 16:14
8 THE WITNESS: Again, I don't -- with all of 16:14
9 the complexity of engineering, I don't think you can 16:14
10 make a broad brush statement that says, Oh, this would 16:14
11 just be a simple thing to do. 16:14
12 MR. KIM: Q. So GBr3 has [REDACTED] [REDACTED]
13 [REDACTED] correct? 16:15
14 A Yes, that's correct. 16:15
15 Q And it has a single optical cavity? 16:15
16 A Yes, that's correct. 16:15
17 Q And the [REDACTED] for GBr3, 16:15
18 that's [REDACTED]? 16:15
19 A That sounds correct. But I would prefer to 16:15
20 look at a detailed specification to confirm that 16:15
21 number. 16:16
22 Q All right. 16:16
23 I think you can go to the list of Trade 16:16
24 Secrets and turn to -- let's see -- page 25. 16:16
25 A Okay. Nope, I don't need that anymore. 16:16

1 Sorry. 18:39

2 Well, I believe my original opinions were 18:39

3 reasonable based on the information then available. 18:40

4 The newly provided information requires me to withdraw 18:40

5 my opinion that the Fuji system infringes the 18:40

6 '922 patent and the '464 patents. 18:40

7 Q So your current opinion is that Fuji does not 18:40

8 infringe the '922 and the '464 patents; correct? 18:40

9 A That is correct. 18:40

10 Q And in your declaration, you said that you 18:40

11 reviewed all of the asserted patents in this case; 18:40

12 correct? 18:40

13 A In the original declaration? 18:40

14 Q Yes. 18:40

15 A Yes. 18:40

16 Q And so aside from the '944 and '922 patents, 18:40

17 is it your opinion that Fuji does not infringe any of 18:40

18 those asserted patents? 18:40

19 MR. BAYER: You said '944? 18:40

20 MR. KIM: Q. Aside from the '922 and the 18:41

21 '464, is it your opinion that Fuji does not infringe 18:41

22 any of the other asserted patents in this case? 18:41

23 MR. JAFFE: Objection; form. 18:41

24 THE WITNESS: Can I ask what other asserted 18:41

25 patents you're referencing? 18:41